

JONATHAN DAVID FRANK SBN89384
160 Thorn Street Suite 2
San Diego, CA 92103
(858) 722-2100

Attorney for Material Witnesses

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Hon. LOUISA PORTER

UNITED STATES OF AMERICA,)	Case No. 08CR0212JLS
)	Mag. No. 08MJ8417
Plaintiff,)	
)	NOTICE OF HEARING ON
v.)	MOTION FOR VIDEOTAPE
)	DEPOSITION AND SUBSEQUENT
BENNY LOPEZ,)	VOLUNTARY DEPARTURE OF
JUAN JOSE AGUIRRE-CRUZ)	MATERIAL WITNESS
)	DATE: June 26, 2008
)	TIME: 2:30 P. M.
Defendants.)	DEPT: PORTER
_____)	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on June 26, 2008 at the UNITED STATES DISTRICT COURT located at 940 Front Street, San Diego, CA 92101 before the above-named Judge at 2:30 P. M. or as soon thereafter as the matter may be heard, the material witnesses ISAIAS GUERRERO-MALDONADO, FRANCISCO SORIA-OROZCO, MARCO HERNANDEZ-QUIROZ, PEDRO GAMBOA-OCANA and ARTURO ANDRADE-PEREZ will move the Court for an Order that they be subjected to a videotape deposition prior to trial and subsequent voluntary departure.

This motion will be based on 18 U.S.C. 3144 in that the witnesses' testimony can be adequately secured by deposition and

1 further detention is not necessary to prevent a failure of justice.

2 This motion is further based on this notice of motion, the
3 memorandum of points and authorities and declarations filed
4 herewith, and as such other and further evidence as may be
5 presented at the hearing of the motion.

6 Respectfully submitted,

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8 DATED: June 16, 2008

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10 /s/_____
11 JONATHAN DAVID FRANK,
12 Attorney for Material Witnesses
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